

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

IBRAHIM S. KHAER et al.,	)	
	)	
Plaintiffs	)	
	)	
v.	)	1:16-cv-00652-JCC-MSN
	)	
AL KAWTHAR INTERNATIONAL LLC,	)	
<i>et al</i>	)	
	)	
Defendants.	)	

**AFFIDAVIT OF MATTHEW T. SUTTER**  
**IN SUPPORT OF ATTORNEY'S FEES AND COSTS**

1. My name is Matthew T. Sutter, I am a lawyer in Virginia, I represent the Plaintiffs IBRAHIM S. KHAER, FOUIZA MOHAMED HADGAG, HAMDY HASSAN AHMED SIYAM and GEBREMESKEL YEMANE KIDST (hereinafter, "Plaintiffs") in the above referenced case, my normal hourly billing rate is \$400.00 an hour and am otherwise competent to make this affidavit.

2. I am a 2003 graduate of the George Mason School of Law and have been in private practice in Virginia and Washington, DC ever since. I was assisted in the prosecution of this matter by Co-counsel Omar M. Bississo, a Howard University Law School graduate and member of the Virginia state bar.

3. The following tasks were occasioned by my representation of the Plaintiffs in this case which seeks payment of wages for work performed.

04/08/2016	Meeting with Ibrahim S. Khaer	2.0
04/15/2016	t/c with O. Bississo re FLSA collective action complaint	0.4
05/02/2016	emails with O. Bississo re meeting with clients	0.2

05/02/2016	Conf. with O. Bississo re Fouiza Mohamed Hadgag	1.0
05/03/2016	Meeting with O. Bississo and Gebremeskel Yemane Kidst	2.5
05/04/2016	Review health inspector reports on line re 8428 Lee Highway restaurant	0.4
05/04/2016	T/c with Fairfax County FOIA officer and Tax Department re re 8428 Lee Highway restaurant; draft FOIA request to Fairfax County seeking information about ownership of same	1.0
05/04/2016	Research Land records for Richmond and Chesterfield County to determine location of defendants Al Kawthar International LLC, Ibrahim Saed Ahmed and Miriam Ibrahim Elsayed	1.0
05/04/2016	Research Criminal Case on ECF and review press releases involving Defendant Mohamed Seid Ahmed Mohamed	0.6
05/04/2016	emails and t/c with O. Bississo re Hamdi Hassan Ahmed Siyam	0.5
05/05/2016	Meeting with Hamdi Hassan Ahmed Siyam	1.5
05/06/2016	Review Fairfax County FOIA Production	0.5
05/06/2016	t/c with witness, H Tain re operations at 8428 Lee Highway	0.5
05/06/2016	emails and t/c with O Bississo re operations at 5515 Wilson Blvd., Arlington, VA 22205	0.4
05/06/2016	prep retainer agreements with O. Bississo; conf. with O. Bississo re same	0.4
05/09/2016	emails with D. Dyer of Fairfax County re FOIA request	0.2
05/10/2016	Conf. with O Bississo re operations at 5515 Wilson Blvd Arlington, VA 22205	0.3
05/10/2016	Review updated FOIA response from Fairfax County	0.2
05/17/2016	Research operations at 5515 Wilson Blvd., Arlington, VA 22205 on line; submit FOIA request to Arlington County re same	2.0
05/17/2016	Draft lawsuit and email to O. Bississo for comments/review	6.0
05/23/2016	Emails and t/c with O. Bississo and Fouiza Mohamed Hadgag	0.8

05/24/2016	Review FOIA production from Arlington County re operations at 5515 Wilson Blvd., Arlington, VA 22305	0.8
05/24/2016	t/c with Fouiza Mohamed Hadgag and O. Bississo re lawsuit	0.5
05/24/2016	Edits to Lawsuit	1.0
05/31/2016	emails with O. Bississo re lawsuit and calls from Ibrahim S. Khaer	0.2
06/03/2016	t/c with O. Bississo re client questions about retainer agreements and filing suit	0.2
06/06/2016	O. Bississo re client questions about retainer agreements and filing suit	0.4
06/07/2016	Edits to lawsuit; drafty summonses and civil cover sheet for filing	4.0
06/10/2016	Hand-file lawsuit and summonses for execution by clerk; conf. with O. Bississo re same; calls to clients re same	2.0
07/15/2016	email with O. Bississo re service of summonses	0.1
07/05/2016	t/c with process sever in Richmond (Hester) re summonses service	0.3
07/05/2016	letter and t/c/ with process server in northern Virginia (Alliance Litigation) re service of summonses in Fairfax and Arlington	0.3
07/07/2016	t/c with process sever in northern Virginia about attempts at service	0.3
07/12/2016	t/c with O. Bississo re service of process in Richmond and northern Virginia; lawsuit allegations	0.4
07/18/2016	t/c with process server in Richmond about investigation of address for defendants Al Kawthar International LLC, Ibrahim Saed Ahmed and Miriam Ibrahim Elsayed	0.3
07/19/2016	Meeting with all clients and O Bississo	1.4
07/20/2016	t/c with O Bississo re service addresses	0.1
08/01/2016	review service affidavits and t/c with process server in Richmond; research new restaurant "Sahara Grill" located at 114 E Clay Street, Richmond, VA 23219 operated by defendants Ibrahim Saed Ahmed and Miriam Ibrahim Elsayed	1.2



08/16/2016	prepare copies of summonses for mailing; draft certificate of mailing re same; filed certificate via ECF	1.0
08/16/2016	Draft Motion for Entry of Default against Defendants and accompanying affidavits	8.5
08/22/2016	emails with O. Bississo re motion for default, declarations from clients; O. Bississo attorney's fees affidavit	1.0
08/23/2016	conf. with O. Bississo and Hamdi Hassan Ahmed Siyam re declaration	1.0
08/24/2016	t/c with D Hester (private investigator) re operations in Richmond by defendants AL KAWTHAR INTERNATIONAL LLC	0.4
08/24/2016 0.6	Review Answer/Motion to Dismiss filed by Mohamed Seid Ahmed Mohamed	
08/24/2016	t/c with Jad Sasour, Esq. re Defendants JIHAD KHATIB and MAWYA ABU AL-HAWA	0.5
08/25/2016	Conf. with O Bississo re declarations and edits based on Ramadan sched.	0.6
08/29/2016	emails with O Bississo re declarations and answer filed by Mohamed Seid Ahmed.	0.2
08/29/2016	emails with D Hester re additional investigation in Richmond	0.1
08/30/2016	Meeting with O. Bississo and Gebremeskel Yemane Kidst and sign Declaration in support of default	1.5
08/30/2016	conf call with Hamdi Hassan Ahmed Siyam and O. Bississo re Declaration in support of default; edits to same	1.0
08/30/2016	Meeting with O. Bississo and Gebremeskel Yemane Kidst and sign Declaration in support of default	1.5
08/30/2016	Meeting with O. Bississo Ibrahim S. Khaer and Fouiza Mohamed Hadgag re declarations in support of default	2.5
08/30/2016	Edits to Application for Default based on revised declarations from Clients	2.0
09/06/2016	Edits to Application for Default; conf. w. O Bississio re same; file and server	1.0

4. The total amount of attorney time spent was 58.7 hours, which at my standard hourly rate, is the equivalent to \$23,480.00

5. The total costs incurred amount to \$1474.09. A slip listing accompanying this affidavit identifies the costs incurred which were related to FOIA request fees, copy fees, filing fees and service fees.

6. Further the affiant sayeth not.

Respectfully Submitted,

  
Matthew T. Sutter

COMMONWEALTH OF VIRGINIA:  
CITY/COUNTY of Alexandria, to wit:

On this 6<sup>th</sup> day of September 2016, Matthew T. Sutter, appeared before me, the undersigned notary public in and for the jurisdiction aforesaid, and after being duly sworn, stated that the facts the aforesaid Affidavit are true to the best of his knowledge.

  
NOTARY PUBLIC

My Commission Expires: 08/31/2020

Registration Number: 7210177

GRETCYNN GAY MEINKEN  
NOTARY PUBLIC  
REGISTRATION # 7210177  
COMMONWEALTH OF VIRGINIA  
MY COMMISSION EXPIRES  
AUGUST 31, 2020